

# COHEN & GREEN

December 19, 2022

Hon. Vera M. Scanlon, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

By Electronic Filing.

**Re: Payamps v. City of New York, 22-cv-00563**

Dear Judge Scanlon:

I am co-counsel for Plaintiff in this matter. I write on behalf of Plaintiff to request an extension of time for joinder and amendments to the pleadings, until January 27, 2023.<sup>1</sup> Defendants consent to this request. The reason for this request is that Plaintiff expects to receive interrogatory and document request responses from Defendants by December 22, 2022, which are necessary to identify the John Doe defendants here and otherwise amend the complaint. Depending on the responses, depositions may also be necessary. Additionally, there is a mediation scheduled for January 12, 2023 in this matter, which may resolve this case.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

Elena L. Cohen

*Pronouns: She/Her*

**COHEN&GREEN P.L.L.C.**

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cc:

All relevant parties by ECF.

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<sup>1</sup> Joinder and amendment of pleadings was initially set for October 28, 2022. The parties subsequently agreed to move this date to December 20, 2022.